

# Exhibit “B”

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE		
	Plaintiff,	C.A. NO: 02-CV-4440
v.		
TRANS UNION LLC CITY OF PHILADELPHIA	Defendants.	

**DECLARATION OF NICHOLAS PALMER**

Nicholas Palmer makes the following Declaration pursuant to 28 U.S.C. §1746:

1. I am an independent contractor for Superior Information Services, LLC. I have had a contract with Superior since May 1998. I reside in Philadelphia, Pennsylvania and I am over the age of eighteen and I am authorized to make this affidavit.
2. As an independent contractor for Superior, I go to the Philadelphia Court of Common Pleas and Municipal Court to verify public record information, including judgments.
3. I have been employed full-time at the Prothonotary's Office of the Philadelphia Court of Common Pleas since December 1980 to the present. From 1994 to present, I have been a Court Administrative Officer (supervisor) at the Prothonotary's Office. I was a Second Filing clerk from 1980-1982; Certifications clerk from 1982-1983; Finance clerk from 1983-1986; Judgment Index and UCC clerk from 1986-1998; and Passports and UCC's from 1998-present.
4. I became a part-time independent contractor verifier with Superior in May 1998. My duties are, and have been since I started working for Superior, to verify public record information from the Philadelphia Court of Common Pleas and Philadelphia Municipal Courts.

5. Superior communicates the disputes to me on a standard form, an example of which is attached hereto as Exhibit "1."

6. In order to verify information for Superior at the Philadelphia Municipal Court, I fill out a record request form in the Court's Records Room. A Court employee retrieves the entire Court file which I review in the Records Room. In the event the Court file is older and has been archived, I sometimes will receive the file the following day.

7. When I verify judgments for Superior, I am required by Superior to review the actual court documents and records. In the Philadelphia Municipal Court, there is no public access terminal for me to review the court dockets so my verifications are all performed using the actual Court file, pleadings and records for each case.

8. Once the Court employee retrieves the file, I review the entire file to verify the disputed information pursuant to the "VERIFICATIONS" instruction sheet provided to me by Superior. (See Exhibit "2"). I understand that it is of utmost importance to Superior that I provide as much information as possible because the verifications are also used to update Superior's records.

9. I mark up the form (Exhibit "1") and return the form to Superior by fax.

10. I have no independent recollection of verifying a judgment with respect to a Grace Lawrence in 2001. All records I had relating to any verification would have been given to Superior.

11. Based on my extensive experience as a clerk in the Prothonotary in the Philadelphia Court of Common Pleas, I understand, and for many years understood, the meaning of the term counter-claim and was aware that if a judgment is for a defendant on a counter-claim that a judgment should be reported against the plaintiff as the counterclaim-defendant, not against the party listed as the defendant on the lawsuit.

I declare under penalty of perjury that the foregoing is true and correct.



NICHOLAS PALMER

DATED: August 7, 2003

# Exhibit “B-1”

PG

COUNTY: PHILA MU

# Exhibit “B-2”

### VERIFICATIONS

The following information should be researched when doing verifications, unless otherwise instructed:

#### Federal Tax Liens

1. Docket number
2. Filing Date
3. Debtor's name(s)
4. Debtor's address
5. Debtor's social security number or ID number
6. Total amount due
7. Status- open or release information with date
8. Serial Number

#### Suits, Judgments, Foreclosures and State Liens

1. Docket number
2. Filing Date
3. Plaintiff's Name(s)
4. Plaintiff's Attorney
5. Defendant's Name(s)
6. Defendant's Address
7. Judgment Amount
8. Defendant's social security number (if available)
9. Satisfied/Dismissed/Settled/Bankruptcy filed information with date

#### Bankruptcy

1. Docket Number
2. Filing Date
3. Debtor's name(s)
4. Debtor's address
5. Debtor's Social Security or ID number
6. Chapter Number
7. Discharged/Dismissed/Closed information with date

This information is used to update our own system, as well as, for verifications. It is of the utmost importance that you provide as much of the required information as possible.

This is a maximum ONE WEEK turn around for normal verifications, and if you find you need more time, please alert your Supervisor.

RUSH verifications are to be researched and called in to the office the same day, or the first thing the next morning.

*Superior Information Services, LLC*

*1.800.432.8384*